

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Norman IP Holdings, LLC,

Plaintiff,

v.

TP-LINK TECHNOLOGIES COMPANY,
ET AL.,

Defendants.

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Civil Action No. 6:13-cv-384

Jury Trial Demanded

**PLAINTIFF NORMAN IP HOLDINGS, LLC’S ANSWER TO DEFENDANT
CRESTRON ELECTRONICS, INC.’S COUNTERCLAIMS**

Plaintiff Norman IP Holdings, LLC (“Norman”), hereby responds to the counterclaims asserted in Defendant Crestron Electronics, Inc.’s (“Crestron”) Answer, Affirmative Defenses, and Counterclaims to Plaintiff’s First Amended Complaint (“the Counterclaims”) as follows. The numbered paragraphs in Norman’s Answer below correspond to the like-numbered paragraphs of the Counterclaims. Except as expressly admitted below, Norman denies the allegations and characterizations in Crestron’s Counterclaims, and in support thereof would show the following:

ANSWER TO COUNTERCLAIMS

The Parties

164. Upon information and belief, admitted.

165. Denied.

Jurisdiction and Venue

166. Admitted.

167. Admitted.

Counterclaim Count I – Non-Infringement of U.S. Patent No. 5,592,555

168. Denied.

169. Denied.

170. Denied.

Counterclaim Count II – Invalidity of U.S. Patent No. 5,592,555

171. Denied.

172. Denied.

173. Denied.

174. Denied.

Counterclaim Count III – Unenforceability Due to Inequitable Conduct

175. Denied.

176. Denied.

Counterclaim Count IV – Unenforceability under Equitable Doctrine

177. Denied.

Counterclaim Count V – Breach of Contract

178. Plaintiff lacks information sufficient to admit or deny, and therefore denies same.

179. Plaintiff lacks information sufficient to admit or deny, and therefore denies same.

180. Plaintiff lacks information sufficient to admit or deny, and therefore denies same.

181. Plaintiff lacks information sufficient to admit or deny, and therefore denies same.

182. Admitted.

183. Admitted.

184. Denied.

185. Denied.

186. Denied.

187. Denied.

188. Denied.

189. Denied.

190. Denied.

Counterclaim Count VI – Exceptional Case

191. Denied.

192. Admitted.

193. Admitted.

194. Admitted.

195. Denied.

196. Denied.

197. Denied.

198. Admitted.

199. Plaintiff lacks information sufficient to admit or deny, and therefore denies same.

200. Denied.

201. Admitted.

202. Plaintiff lacks information sufficient to admit or deny, and therefore denies same.

203. Admitted.

204. Denied.

205. Denied.

206. Plaintiff lacks information sufficient to admit or deny, and therefore denies same.

207. Denied.

- 208. Denied.
- 209. Denied.
- 210. Denied.
- 211. Denied.
- 212. Admitted.
- 213. Admitted.
- 214. Admitted.
- 215. Admitted.
- 216. Plaintiff lacks information sufficient to admit or deny, and therefore denies same.
- 217. Admitted that a typo was made. Denied that a false representation was made.
- 218. Admitted.
- 219. Admitted.
- 220. Admitted.
- 221. Denied.
- 222. Admitted.
- 223. No factual assertion is made in paragraph 223.
- 224. Admitted.
- 225. Admitted.
- 226. Admitted.
- 227. Admitted.
- 228. Denied.
- 229. Denied.
- 230. Denied.

- 231. No factual assertion is made in paragraph 231.
- 232. Denied.
- 233. Denied.
- 234. Admitted.
- 235. Admitted.
- 236. Denied.
- 237. Denied.
- 238. Denied.

ANSWER TO CRESTRON ELECTRONICS, INC.'S PRAYER FOR RELIEF

Norman denies that Crestron is entitled to any of the relief requested in its Counterclaims.

Prayer for Relief

WHEREFORE, Plaintiff, Norman IP Holdings, requests that Defendant, Crestron Electronics, Inc., take nothing against Plaintiff by reason of its counterclaims against Plaintiff, that Plaintiff be awarded the relief sought in its Complaint, that the Court dismiss Crestron's Counterclaims against Plaintiff in their entirety with prejudice, that Plaintiff be awarded its costs of suit, including attorneys' fees, and that the Court grant such other and further relief as it deems just and proper.

Respectfully submitted,

Dated: May 15, 2014

By: /s/ Andrew G. DiNovo
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**ATTORNEYS FOR PLAINTIFF
NORMAN IP HOLDINGS, LLC'S**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to FED. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 15th day of May, 2014

/s/ Andrew G. DiNovo

Andrew G. DiNovo